



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

July 18, 2018

Via ECF

The Honorable Paul A. Crotty  
United States District Judge  
Southern District of New York  
United State Courthouse  
500 Pearl Street, Courtroom 14C  
New York, New York 10007

**Re: *United States v. Joshua Adam Schulte*, S1 17 Cr. 548 (PAC)**

Dear Judge Crotty:

We write to provide an update to the Court in the above-referenced matter and to respectfully request that the Court adjourn the conference scheduled for July 18, 2018 at 11:00 a.m.

As the Court is aware, on June 18, 2018, a superseding indictment was filed that charged the defendant with the same child pornography charges contained in the original Indictment, as well as, among others, violations of 18 U.S.C. §§ 641, 793, 1030, and 1001 (collectively the “Espionage Charges”).<sup>1</sup> Since the last conference on June 28, 2018, the Government has begun producing discovery related to Espionage Charges. This has included producing to the defendant and his counsel material in unclassified discovery. It has also included making available to the defendant and his counsel a substantial amount of classified discovery at a secure facility at the Federal Bureau of Investigation.

While the Government has made substantial progress in producing discovery with respect to the Espionage Charges, its production is not yet complete. Accordingly, the Government respectfully requests that the Court adjourn the upcoming conference for approximately thirty days so that the Government can continue producing discovery. The Government also respectfully requests that the Court exclude time in the interest of justice under the Speedy Trial Act until the rescheduled conference so that the Government can continue producing discovery and the defendant can review it.

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<sup>1</sup> The Government completed its production of discovery with respect to the child pornography charges prior to the return of the Superseding Indictment. As noted in the Government’s letter dated July 6, 2018, the Government has worked with defense counsel to ensure the defendant has access to that discovery.

Cc: Defense Counsel (via ECF)